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Attorney for Defendant
Christian Anthony Romero

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

United States of America,

Plaintiff,

v.

Jose Guadalupe Lopez-Zamora,
Leonardo Flores Beltran,
Christian Anthony Romero,
Baudelio Vizcarra, Jr.,
Joaquin Alberto Sotelo Valdez,
Erika Gabriela Zamora Rojo,
Alejandro Tello,
Jose Luis Aguilar Saucedo, and
Rosario Zamora Rojo,

Defendants.

Case No.: 2:21-cr-00007-DAD

Hon. Dale A. Drozd

**[PROPOSED] ORDER APPOINTING
JOHN C. ELLIS, JR. AS
COORDINATING DISCOVERY
ATTORNEY**

It is hereby **ORDERED** that John C. Ellis, Jr., is appointed as Coordinating
Discovery Attorney for court-appointed defense counsel in the following case: *United
States v. Jose Guadalupe Lopez-Zamora et al.*, No. 21-cr-00007 (DAD/KJN/DB).
His time and the time spent by his staff will be paid by the Administrative Office of
the U.S. Courts, Defender Services Office.

1 The Coordinating Discovery Attorney shall oversee any discovery issues
2 common to all defendants with court-appointed counsel. His responsibilities will
3 include:
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- 5 • Managing and, unless otherwise agreed upon with the Government,
6 distributing discovery produced by the Government and relevant
7 third-party information common to defense counsel for all defendants;
- 8 • Evaluating the volume and type of discovery to determine what
9 technologies will ensure duplicative costs are avoided and the most
10 efficient and cost-effective methods are identified;
- 11 • Acting as a liaison with the United States Attorney's Office to ensure the
12 timely and effective exchange of discovery;
- 13 • Identifying, evaluating, and engaging third-party vendors and other
14 litigation support services;
- 15 • Assessing the needs of defense counsel and further identifying any
16 additional vendor support that may be required—including copying,
17 scanning, forensic imaging, data processing, data hosting, trial
18 presentation, and other technology depending on the nature of the case;
- 19 • Identifying any additional human resources that may be needed by
20 defense counsel for the organization and substantive review of
21 information; and
- 22 • Providing training services to the defense teams as a group and
23 individually.

24 The Coordinating Discovery Attorney's duties do not include providing
25 representation services, and therefore will not be establishing an attorney-client
26 relationship with any of the defendants. Discovery intended for counsel of a specific
27 defendant and not to be shared among all defense counsel, shall be produced by the
28 Government directly to defense counsel for that defendant. For discovery common
to all defendants ("common discovery"), discovery issues specific to any defendant

1 shall be addressed by defense counsel directly with the Government and not through
2 the Coordinating Discovery Attorney.

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4 For common discovery that has already been produced by the Government
5 prior to this Order, the Government shall provide a copy to the Coordinating
6 Discovery Attorney. Additional common discovery not already produced shall be
7 provided directly to the Coordinating Discovery Attorney, who shall duplicate and
8 distribute the discovery to all defense counsel, unless otherwise agreed to by the
9 parties. When the Government elects to produce discovery directly to defense
10 counsel, it shall simultaneously provide a copy to the Coordinating Discovery
11 Attorney. The Government shall work with the Coordinating Discovery Attorney to
12 provide discovery in a timely manner.

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15 The Coordinating Discovery Attorney shall petition this Court, *ex parte*, for
16 funds for outside services. The CDA shall monitor all vendor invoices to confirm the
17 work that was performed. All petitions for outside services shall include a basis for
18 the requested funds and a determination that the costs of the services are reasonable.
19 The Coordinating Discovery Attorney shall also provide this Court with monthly *ex*
20 *parte* status reports depicting the status of work and whether that work remains
21 within the budget of any funds authorized by the Court, with a copy provided to
22 defense counsel.
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1 DATED this _____ day of _____, 2023.
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6 The Honorable Dale A. Drozd
7 United States District Judge
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